

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

No. 4:20-CR-305-O

SEAN ALEXANDER HARRIS (01)

FACTUAL RESUME

INFORMATION/INDICTMENT: Conspiracy to Possess a Controlled Substance with Intent to Distribute, In violation of 21 U.S.C. § 846 (21 U.S.C. §§ 841(a)(1) and (b)(1)(C)).

MAXIMUM PENALTY:

- Imprisonment for a period not more than 20 years;
- A fine not to exceed \$1,000,000 or both a fine and imprisonment;
- A supervised-release term of not less than 3 years. If the defendant violates any of the supervised-release conditions, the Court may revoke such term of supervised release and require the defendant to serve an additional period of confinement;
- A \$100 mandatory special assessment;
- Restitution to victims or to the community; and
- Forfeiture of property.

ELEMENTS OF THE OFFENSE:

The essential elements which must be proved beyond a reasonable doubt in order to establish the offense charged in the Information/Indictment are as follows:

First: That two or more persons, directly or indirectly, reached an agreement to distribute or possess with intent to distribute a controlled substance, as charged in the Information or Indictment,

Second: That the defendant knew of the unlawful purpose of the agreement; and

Third: That the defendant joined in the agreement willfully, that is, with the intent to further its unlawful purpose.

STIPULATED FACTS:

Beginning no later than on in or around March 9, 2020, and continuing into until no earlier than and including October 6, 2020, in the Fort Worth Division of the Northern District of Texas, **Sean Alexander Harris**, along with others known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C), namely to possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

Since at least as early as March 9, 2020, and continuing through no earlier than October 6, 2020, **Harris** obtained methamphetamine, marijuana, and other narcotics from sources of supply in California and other locations. **Harris** conspired with others to sell the narcotics using "dark web" internet websites. **Harris** and his conspirators mailed the narcotics to customers throughout the United States through the U.S. Postal Service and other carriers using fictitious business names. On October 6, 2020, investigators found more than a pound of methamphetamine in a conspirator's apartment, along with other narcotics, drug distribution paraphernalia, and \$23,500 in cash. In this manner, **Harris** conspired with others to possess ~~heroin~~ with the intent to distribute it.

methamphetamine CAC SH

SIGNED this 19 day of November, 2020.



SEAN ALEXANDER HARRIS
Defendant



CODY COFER
Counsel for Defendant